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United States Trustee for Region 17

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

THE ROMAN CATHOLIC ARCHBISHOP OF
SAN FRANCISCO,

Debtor and Debtor in Possession.

Bankruptcy Case
No. 23-30564

Chapter 11

Date: September 14, 2023

Time: 1:30 p.m.

Place: Via ZoomGov

Judge: Hon. Dennis Montali

**DECLARATION OF KRISTIN A. MCABEE IN SUPPORT OF OBJECTION OF THE
UNITED STATES TRUSTEE TO FINAL APPROVAL OF DEBTOR'S MOTION FOR
CONTINUED USE OF EXISTING CASH MANAGEMENT SYSTEM**

I, Kristin A. McAbee, declare as follows:

1. I am employed as a Bankruptcy Analyst in the Fresno Office of the United States Trustee, Region 17 (the "UST"), and I am over the age of 18. I am the Bankruptcy Analyst assigned to the bankruptcy case of *The Roman Catholic Archbishop Of San Francisco*, Case No. 23-30564 DM. I have personal knowledge of the facts set forth herein, and based on that

1 personal knowledge, I assert that all such facts are true and correct to the best of my knowledge.
2 To the extent I base my testimony upon information and belief or upon admissible evidence
3 other than my personal knowledge, I will specifically so state.

4 2. As part of my duties as a Bankruptcy Analyst, I am responsible for the
5 supervision of Chapter 11 cases in the Office of the United States Trustee, Region 17. This
6 supervision includes: monitoring Chapter 11 cases; reviewing petitions, schedules, statements
7 and related documents, and pleadings filed by a Chapter 11 debtor and other parties in interest;
8 conducting the Initial Debtor Interview and requesting documents related to the Interview;
9 reviewing monthly operating reports and post-confirmation quarterly reports; monitoring plans
10 and disclosure statements; and other such other actions as the UST deems appropriate.

11 3. I am familiar with the record keeping practices of the UST in Chapter 11 cases.
12 In Chapter 11 cases, our office requests numerous documents from debtors in connection with
13 the initial debtor interview, the meeting of creditors, and throughout the case. It is the regular
14 practice of our office to maintain responsive documents received from debtors. At or near the
15 time the responsive documents are received, the documents are placed and maintained in an
16 electronic case file.

17 4. On August 25, 2023, I was copied on an email from Jason Blumberg, a Trial
18 Attorney for the UST, to the Debtor's counsel (Mr. Katz). In his email, Mr. Blumberg
19 requested that the Debtor provide the most recent account statements and documentation
20 regarding account holdings for the Debtor's U.S. Bank Investment Pool Account and its BofA
21 Securities Account (#9371).

22 5. Based on my review of the UST's file for this case, it appears that the Debtor has
23 not yet provided the requested documentation.
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1 I declare under penalty of perjury that the foregoing is true and correct.

2 Executed on September 7, 2023, in Fresno, California.

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6 Kristin A. McAbee
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